

1 E. MARTIN ESTRADA
United States Attorney
2 DAVID M. HARRIS
Assistant United States Attorney
3 Chief, Civil Division
JOANNE S. OSINOFF
4 Assistant United States Attorney
Chief, Complex and Defensive Litigation Section
5 ALEXANDER L. FARRELL (Cal. Bar No. 335008)
Assistant United States Attorney
6 Federal Building, Suite 7516
300 North Los Angeles Street
7 Los Angeles, California 90012
Telephone: (213) 894-5557
8 Facsimile: (213) 894-7819
E-mail: Alexander.Farrell@usdoj.gov
9

Attorneys for Defendant
10 United States Small Business Administration

11 UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13

14 BRANDON JOE WILLIAMS,
15 Plaintiff,
16 v.
17 UNITED STATES SMALL
BUSINESS ADMINISTRATION,
18 Defendant.
19

No. 2:24-cv-09553-RGK-SK

**UNITED STATES SMALL BUSINESS
ADMINISTRATION'S RESPONSE TO
PLAINTIFF'S "OBJECTIONS TO
COURT ORDER" [DKT. 24]**

Honorable R. Gary Klausner
United States District Judge

DEFENDANT’S RESPONSE TO PLAINTIFF’S “OBJECTIONS”

Defendant the United States Small Business Administration (“SBA”) responds as follows to the pleading filed by plaintiff Brandon Joe Williams [Dkt. 24] on January 6, 2025. Plaintiff’s pleading is titled as “OBJECTIONS REGARDING ORDER FROM 12/30/24 (DOCKET #23).” *See* Dkt. 24 (“Plaintiff’s Objections”); *see also* Dkt. 24-1 (“Affidavit” in support). This pleading includes arguments in support of the Plaintiff’s Motion for Reconsideration [Dkt. 27], but the pleading itself does not request a response from the SBA.

Courts have construed an “objection” to an order filed by *pro se* plaintiffs as a motion for reconsideration. *See e.g., Borsotti v. Nationstar Mortg., LLC*, 2018 WL 6252457, at *1 (C.D. Cal. Mar. 1, 2018) (construing a *pro se* plaintiff’s objection the district judge’s order as a motion for reconsideration); *see also Robinson v. Gen. Manager of Calpia*, 2021 WL 4923309, at *1 (C.D. Cal. Oct. 21, 2021) (same); *see also Kraft v. Tulare Cnty.*, 2023 WL 5417496, at *1 (E.D. Cal. Aug. 22, 2023) (“Plaintiff filed a document titled ‘Plaintiff’s Objections’ under Rule 46, which the Court construes as a renewed motion for reconsideration.”); *Meeks v. Nunez*, 2017 WL 262058, at *1 (S.D. Cal. Jan. 19, 2017), *dismissed*, 2017 WL 3445131 (9th Cir. Mar. 3, 2017) (same).

To the extent the Court considers the Plaintiff’s Objections as a motion for reconsideration, the Plaintiff’s Objections is duplicative of his Motion for Reconsideration, filed on January 10, 2025.¹ Dkt. 27. The SBA opposes the Plaintiff’s Objections and incorporates its arguments in the SBA’s Opposition Brief to Plaintiff’s Motion for Reconsideration.

¹ To the extent that Plaintiff brings his Objections as a non-human entity, as “BRANDON JOE WILLIAMS ®” – a “public corporation” [Dkt. 24 ¶ 1], the Court should deny the motion because a non-human entity cannot appear *pro se* in this Court and must be represented by a member of this Court’s bar. *See* CD. Cal. L.R. 83-2.1.1.1; 83-2.2; 83-2.2.2.

1 Dated: January 17, 2025

Respectfully submitted,

2 E. MARTIN ESTRADA
United States Attorney
3 DAVID M. HARRIS
Assistant United States Attorney
4 Chief, Civil Division
5 JOANNE S. OSINOFF
Assistant United States Attorney
6 Chief, Complex and Defensive Litigation Section

7 /s/ Alexander L. Farrell
8 ALEXANDER L. FARRELL
Assistant United States Attorney

9 Attorneys for Defendant United States Small
10 Business Administration

11 **Local Rule 11-6.2 Certificate of Compliance**

12 The undersigned counsel of record certifies that this Response statement contains
13 319 words and is 1 page which complies with the word limit set by L.R. 11-6.1 and the
14 page limit set by the Court's Standing Order [Dkt. 6].

15
16 Dated: January 17, 2025

/s/ Alexander L. Farrell
17 ALEXANDER L. FARRELL
18 Assistant United States Attorney
19
20
21
22
23
24
25
26
27
28